

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NEW YORK CITY EMPLOYEES'  
RETIREMENT SYSTEM, THE NEW YORK  
CITY POLICE PENSION FUND, THE  
BOARD OF EDUCATION RETIREMENT  
SYSTEM OF THE CITY OF NEW YORK,  
THE TEACHERS' RETIREMENT SYSTEM  
OF THE CITY OF NEW YORK VARIABLE  
ANNUITY PROGRAM, THE NEW YORK  
CITY FIRE DEPARTMENT PENSION  
FUND, THE NEW YORK CITY FIRE  
OFFICERS' VARIABLE SUPPLEMENTS  
FUND, THE NEW YORK CITY FIRE  
FIGHTERS' VARIABLE SUPPLEMENTS  
FUND, and THE NEW YORK CITY  
DEFERRED COMPENSATION PLAN,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., J. MICHAEL  
PEARSON, HOWARD B. SCHILLER,  
ROBERT L. ROSIELLO, TANYA CARRO,  
PRICewaterhouseCOOPERS LLP,  
BARCLAYS CAPITAL INC., and  
DEUTSCHE BANK SECURITIES INC.

Defendants.

Civil Action No. 3:18-cv-00032 (MAS) (LHG)

**STIPULATION AND ~~WARRANTY~~ ORDER**

WHEREAS, Plaintiffs have filed a Complaint against Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, Tanya Carro, PricewaterhouseCoopers LLP, Barclays Capital Inc., and Deutsche Bank Securities Inc. (together, "Defendants," and together with Plaintiffs, the "Parties");

WHEREAS, on January 19, 2018, the Court entered a Stipulation and Confidentiality Order (“Confidentiality Order”) in *T. Rowe Price Growth Stock Fund, Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-5034-MAS-LHG (ECF No. 89); *Equity Trustees Limited, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-6127-MAS-LHG (ECF No. 85); *Principal Funds, Inc., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-6128-MAS-LHG (ECF No. 83); *BloombergSen Partners Fund LP, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7212-MAS-LHG (ECF No. 82); *Pentwater Equity Opportunities Master Fund Ltd., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-7552-MAS-LHG (ECF No. 42); *Discovery Global Citizens Master Fund, Ltd., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7321-MAS-LHG (ECF No. 74); *MSD Torchlight Partners, L.P., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7324-MAS-LHG (ECF No. 74); *BlueMountain Foinaven Master Fund L.P., et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7328-MAS-LHG (ECF No. 74); *Incline Global Master LP, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7494-MAS-LHG (ECF No. 75); *Valic Company I, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7496-MAS-LHG (ECF No. 75); *Janus Aspen Series, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 16-cv-7497-MAS-LHG (ECF No. 80); *Okumus Opportunistic Value Fund, Ltd. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-6513-MAS-LHG (ECF No. 48); *Public Employees Retirement System Of Mississippi v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-7625-MAS-LHG (ECF No. 69); *The Boeing Company Employee Retirement Plans Master Trust, et al. v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-7636-MAS-LHG (ECF No. 71); *Lord Abbett Investment Trust—Lord Abbett Short Duration Income Fund, et al., v.*

*Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-6365-MAS-LHG (ECF No. 70); *State Board of Administration of Florida v. Valeant Pharmaceuticals International, Inc. et al.*, No. 17-cv-12808-MAS-LHG (ECF No. 19); and *The Regents of the University of California v. Valeant Pharmaceuticals International, Inc. et al.*, No. 17-cv-13488-MAS-LHG (ECF No. 19) (collectively, the “Actions”);

WHEREAS, Paragraph 33 of the Confidentiality Order provides that it “shall apply to any action deemed related to *In re Valeant Pharmaceutical International, Inc. Sec. Litig.*, Master No. 3:15-cv-07658-MAS-LHS, including currently pending actions and subsequently filed actions”;

WHEREAS, counsel for the Parties have conferred and agreed to deem this action related to *In re Valeant Pharmaceutical International, Inc. Sec. Litig.*, Master No. 3:15-cv-07658-MAS-LHS for purposes of the Confidentiality Order;

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, that the Confidentiality Order entered in the Actions shall apply to this action and respectfully request the Court to enter the Confidentiality Order on the docket.

Stipulated and agreed to by:

DATED: February 14, 2018

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So Ordered this 21<sup>st</sup> day  
of February, 2018  
